

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ROBIN JOACHIM DARTELL,  
INDIVIDUALLY AND ON BEHALF OF  
ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

vs.

TIBET PHARMACEUTICALS, INC, et al.

Defendants.

CASE No.: 14-CV-3620-JMV-JBC

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF  
SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that Lead Plaintiffs and Class Representatives Obasi Investment Limited, Jude Shao, Robin Dartell, Lixin Wu, Jason Helton and Sean Carithers (collectively “Plaintiffs” or “Class Representatives”) by and through their counsel, will respectfully move this Court, before the Honorable John Michael Vasquez, at the United States District Court, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102 on June 6, 2017 at 11:30 a.m. for Final Approval of Settlement and Plan of Allocation.

This motion is based on this Notice of Motion, Memorandum of Points and Authorities, Declaration of Laurence Rosen submitted herewith, as well as the pleadings and records on file in this case, and other such matters and arguments as the Court may consider on hearing this motion.

Dated: May 9, 2017

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***Lead Class Counsel***

# CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 9, 2017.

Executed on May 9, 2017

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/s/ *Sara Fuks*